



Applica Consumer Products, Inc.
3633 Flamingo Road
Miramar, FL 33014-2936

DOCKET	
04-AAER-1	
DATE	OCT 19 2004
RECD.	OCT 22 2004

October 19, 2004

California Energy Commission
Docket Office
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

Subject: California Regulations on Battery Charges
Reference: Docket Number 04-AAER1

Gentlemen:

These are our comments on this important matter:

The test procedure CEC is referencing is from the EPA Energy Star program on External Power Supplies. EPA has already realized this procedure does not fit with appliance battery chargers. The test procedure does not appropriately measure efficiency of constant current chargers. It seeks to set a "no-load" limit on appliance chargers, which will force costly changes, but save no energy for California consumers, since appliance battery chargers spend basically no time in "no-load" condition.

The test procedure is inappropriate for most appliance battery chargers because it measures the energy characteristics of just the direct plug-in adaptor, but not the full battery charging circuit. In many appliance battery chargers, the circuitry for battery charging is not only in the direct plug-in adaptor, but also in the end product.

Yours truly,

Carmelo Chiu
Product Compliance Manager
Applica Consumer Products
3633 Flamingo Road
Miramar, FL 33027
954-883-1649
carmelo.chiu@applicamail.com